fIN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION

WARNER CHILCOTT COMPANY, LLC AND QUALICAPS CO., LTD., **Plaintiffs,** **v.** **TEVA PHARMACEUTICALS USA, INC.** **Defendant.**	**Civil Action No. 2:15-cv-1471-JRG-RSP**
WARNER CHILCOTT COMPANY, LLC AND QUALICAPS CO., LTD., ***Plaintiffs,*** ***v.*** **MYLAN PHARMACEUTICALS, INC., MYLAN LABORATORIES LIMITED, AND MYLAN, INC.,** ***Defendants.***	**Civil Action No. 2:15-cv-1740-JRG-RSP**

MYLAN PHARMACEUTICALS INC.,
MYLAN LABORATORIES LIMITED, AND MYLAN INC.'S
AMENDED NOTICE OF VIDEOTAPED DEPOSITION OF
REPRESENTATIVE(S) OF QUALICAPS CO., LTD.
PURSUANT TO FEDERAL RULE OF CIVIL PROCEDURE 30(B)(6)

PLEASE TAKE NOTICE that Defendants Mylan Pharmaceuticals Inc., Mylan Laboratories Ltd. and Mylan Inc. (collectively "Mylan") will take the deposition of Plaintiff Qualicaps Co., Ltd. ("Qualicaps"), commencing on February 20, 2017, and continuing thereafter until completed, at a mutually convenient location. The deposition will be taken pursuant to the

Federal Rules of Civil Procedure before an officer and reporter authorized to administer oaths. The deposition will be videotaped and recorded by stenographic means.

As required by Rule 30(b)(6) of the Federal Rules of Civil Procedure, Qualicaps shall designate one or more officers, directors, managing agents, employees, or other sufficiently knowledgeable persons who consents to testify on its behalf with respect to each of the matters set forth in Exhibit A. The persons so designated shall be required to testify as to each of those matters known or reasonably available to Qualicaps. Individuals designated by Qualicaps as a witness under Rule 30(b)(6) shall be identified by name and title no later than two (2) weeks prior to the date on which the deposition shall commence.

PLEASE TAKE FURTHER NOTICE that, pursuant to Rule 30(b)(6), Qualicaps is required to produce the documents listed in Exhibit B at or before the noticed deposition herein. The deponent(s) is/are further required to produce prior to the deposition any and all information or material previously requested in discovery, but not yet produced.

Defendants reserve the right to amend or supplement this notice and these exhibits as more information becomes available to Defendants during the course of discovery.

Dated: March 13, 2017.

Respectfully submitted,

/s/ Jonathan D. Olinger

Mitchell G. Stockwell
Georgia Bar No. 682912
D. Clay Holloway
Georgia Bar No. 363296
Jonathan D. Olinger
Georgia Bar No. 122055
Amanda N. Brouillette
Georgia Bar No. 880528
KILPATRICK, TOWNSEND & STOCKTON LLP
1100 Peachtree Street, Suite 2800
Atlanta, Georgia 30309
(404) 815-6500
(404) 815-6555 (fax)
mmstockwell@kilpatricktownsend.com
mcholloway@kilpatricktownsend.com
mjolinger@kilpatricktownsend.com
mabrouillette@kilpatricktownsend.com

S. Calvin Capshaw
Texas Bar No. 03783900
Elizabeth L. DeRieux
Texas Bar No. 05770585
CAPSHAW DERIEUX LLP
114 E. Commerce Avenue
Gladewater, Texas 75647
(903) 845-5770
ccapshaw@capshawlaw.com
ederieux@capshawlaw.com

COUNSEL FOR DEFENDANTS MYLAN PHARMACEUTICALS, INC., MYLAN LABORATORIES LIMITED, AND MYLAN, INC.

EXHIBIT A

DEFINITIONS

1. The "'180 patent" shall mean U.S. Patent No. 6,649,180.

2. "All" means any, all and each; "each" means all and each; and "any" means all and each.

3. The terms "and" and "or" shall be construed either disjunctively or conjunctively as necessary to bring within the scope of these discovery requests any information that might otherwise be construed to be outside their scope.

4. "Concerning" means, without limitation, alluding to, bearing upon, constituting, containing, discussing, describing, evidencing, identifying, mentioning, in connection with, pertaining to, referring to, relating to, respecting, regarding, responding to, or in any way factually or logically relevant to the matter described.

5. "Defendants" shall mean Mylan Pharmaceuticals Inc., Mylan Laboratories Limited, and Mylan Inc.

6. "Document" shall have the full meaning ascribed under the Federal Rules of Civil Procedure and shall mean, without limitation, any written, recorded, or graphic material of any kind within your possession, custody, or control, whether in paper or electronic form. The term includes, but is not limited to, all agreements; the full meaning ascribed under the Federal Rules of Civil Procedure and shall mean, without limitation, any written, recorded, or graphic material of any kind within your possession, custody, or control, whether in paper or electronic form. The term includes, but is not limited to, all agreements; contracts; letters; telegrams; interoffice communications; facsimile transmissions; memoranda; reports; records; studies; instructions;

specifications; handwritten or typewritten notes; notebooks, scrapbooks; diaries; calendars; plans; drawings; sketches; diagrams; minutes of meetings, conferences and telephone or other conversations; photocopies; charts; graphs; descriptions; drafts; ledgers; financial statements or reports; invoices; bills; microfilm, microfiche, tape, disk, or diskette recordings; computer records and computer printouts. The term "document" includes electronically stored data from which information can be obtained either directly or by translation through detection devices or readers (any such document is to be produced in a reasonably legible and usable form) — including, without limitation, email stored in servers and on hard disks of personal computers. The term "document" also includes the original document (or an identical copy thereof if the original is not available) and all copies that differ in any respect from the original as a result of any notation, symbol, lettering, underlining, marking or other information appearing thereon, and all attachments thereto, and also includes English translations of documents requested herein whenever such translations exist in whole or in part for a document or portion thereof.

7. Each singular word shall include its plural and each plural shall include its singular as necessary to bring within the scope of these discovery requests any information that might otherwise be construed to be outside their scope.

8. "FDA" shall mean the United States Food and Drug Administration.

9. "Include" or "including" denotes a portion of a larger whole and is used without limitation.

10. The "patent-in-suit" shall mean the '180 patent.

11. "Person(s)" means any individual, corporation, firm, partnership, governmental body, incorporated or unincorporated association, and any other legal or commercial entities.

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